McNair Law Firm, P.A.

ATTORNEYS AND COUNSELORS AT LAW

ROBERT L BOCE, MAN rbockman a menair.net

BANK OF AMERICA TOWER 1301 GERVAIS STREET, 11th FLOOR COLUMBIA, SOUTH CAROLINA 29201 www.mcnair.nei

POST OFFICE BOX 11390 COLUMBIA, SOUTH CAROLINA 29211 TELEPHONE (803)799-9800 FACSIMILE (803)376-2219

May 8, 2008

Via Hand Delivery

The Honorable Charles Terreni Chief Clerk and Administrator South Carolina Public Service Commission Post Office Box 11649 Columbia. South Carolina 29211

Re: Application of Chem-Nuclear Systems, LLC (SCPSC Docket No. 2000 266 A) (EV 2007 2008 Proposition)

2000-366-A) (FY 2007-2008 Proceeding)

Dear Mr. Terrini:

Enclosed herewith please find fifteen (15) copies of late-filed Amended Exhibit B to be included in the record of the proceeding in the above-referenced matter. During the hearing on April 29, 2008, the Commission directed Chem-Nuclear Systems, LLC, to correct the typographical error in Amended Exhibit B to the Application and file it as a late-filed exhibit in the record.

Should you have any questions with respect to this matter, please do not hesitate to contact me.

Very truly yours,

Robert T. Bockman

AT-Bool

Enclosure

cc: Len S. Anthony, Esquire (w/encl.) K. Chad Burgess, Esquire (w/encl.) Frank R. Ellerbe, III, Esquire (w/encl.) Jeff M. Nelson, Esquire (w/encl.)

STATE OF SOUTH CAROLINA (Caption of Case) In re: Application of Chem-Nuclear Systems, LLC, for Adjustment in Levels of Allowable Costs and for Identification of Allowable Costs (FY 2007-2008))) BEFORE THE) PUBLIC SERVICE COMMISSION) OF SOUTH CAROLINA)) COVER SHEET)) DOCKET) NUMBER: 2000 - 366 - A		
(Please type or print)				
Submitted by:	Robert T. Bock		SC Bar Number: <u>000747</u>		
Address:	McNair Law Firm, P.A.		Telephone: (803) 799-9	280	
	Post Office Box		Fax: $(803) 732-3$	521	
	Columbia, Sou	th Carolina 29211	Other:		
NOTE: The cover s	heet and information	contained herein neither replace	Email: bbockman@mcnair.net is nor supplements the filing and service	en of plandings or other papers	
Other:	Check one)		or item to be placed on Commissi URE OF ACTION (Check all t		
☐ Electric		Affidavit	Letter	Request	
☐ Electric/Gas		Agreement	Memorandum	Request for Certification	
☐ Electric/Telecommunications		Answer	Motion	Request for Investigation	
☐ Electric/Water		Appellate Review	Objection	Resale Agreement	
Electric/Water/Telecom.		Application	Petition	Resale Amendment	
☐ Electric/Water/Sewer		Brief	Petition for Reconsideration	Reservation Letter	
Gas		Certificate	Petition for Rulemaking	Response	
Railroad		Comments	Petition for Rule to Show Cause	Response to Discovery	
Sewer		Complaint	Petition to Intervene	Return to Petition	
Telecommunications		Consent Order	Petition to Intervene Out of Tin	ne Stipulation	
☐ Transportation		Discovery	Prefiled Testimony	Subpoena	
☐ Water ☐ E		Exhibit	Promotion	☐ Tariff	
☐ Water/Sewer		Expedited Consideration	on Proposed Order	Other:	
Administrative Matter		Interconnection Agreeme	ent Protest		
Other:		Interconnection Amendm	nent Publisher's Affidavit		
		■ Late-Filed Exhibit	Report		

AMENDED EXHIBIT B: FISCAL YEAR 2006-2007 IRREGULAR COSTS ORGANIZED BY PROJECT

PROJECT NUMBERS	PROJECT NAME AND EXPLANATIONS
188000.8005 188000.8006	Decontamination and Corrective Actions (Labor \$548.57 and Non-labor \$1,286.99) Includes costs related to decontamination efforts and corrective actions that were required as a result of waste received for disposal. During fiscal year 2006-2007, costs incurred in these projects, although irregular and non-recurring in nature, were within the scope of waste disposal operations work.
188004.8001	Site Engineering & Drawing Updates (Labor \$41,003.40 and Non-labor \$12,497.26) Labor and contractor costs for site engineering support and preparation and reproduction of site drawings. The engineering support and drawings were required for various analyses and reports submitted to SC DHEC. Included in this project in fiscal year 2006-2007 were three primary tasks: slit trench design package update, (2) rectangular vault efficiency update, and (3) custom vault evaluation.
188007.8001	Irregular Component Disposal (Labor: \$13,148.58 and Non-labor \$153,304.82) Non-routine operations. Includes costs associated with disposal of items that involve unusual handling requirements. Included are waste receipt and inspection, preparations to offload the shipping container or vehicle, placement of the irregular component in its disposal vault (if applicable), survey and transportation vehicle release and closeout. Irregular components disposed of in fiscal year 2006-2007 included twenty-four boxes of components (Tie Bolts) from Norfolk Naval Shipyard: one box containing a shield from the PARR reactor decommissioning project; and a Reactor Pressure Vessel from the Dairyland Power plant at Lacrosse, WI.
188000.8007 188000.8009	Deep Well Abandonment and Monitoring Well Abandonment (Labor \$18,314.25 and Non labor \$1,484.58) Labor and non-labor costs associated with abandonment of twelve environmental monitoring wells.
188000.8008 188004.8002	Miscellaneous Irregular Costs (Trench 86 Clay Cap Evaluation and Multilayer cap fertilizer) (Labor \$29,843.78 and Non-labor \$6,681.30) Costs associated with work to evaluate the initial clay cover over waste in Trench 86. This evaluation includes survey for depth of cover, rework the clay cap as required and installation of earthen berms to divert rain water. Also included here are costs for fertilizing multi-layer caps installed over completed disposal trenches.
188008.8001	Increased Security Controls (Labor \$1,348.93 and Non-labor \$8,781.66) Costs associated with personnel and physical security enhancements as directed

	by SC DHEC to implement increased controls over radioactive materials at the disposal site.
188701.8007 188701.8012 188701.8014 188701.8019 188701.8020 188701.8021 188701.8022 188701.8023 188701.8024	Various Trench Construction and Backfill Operations (Labor \$67,685.99 and Non-labor \$113,595.87) Trench construction activities in fiscal year 2006-2007 included design, construction and backfill (including use of free flowing sand where applicable) in Trench 86, Trench 94, Trench 97, Slit Trench 29, Slit Trench 30, Slit Trench 31, Slit Trench 32, Slit Trench 33, and Slit Trench 34.
952182.8002 952183.8001 952192.8002 188000.8011	Other Irregular Costs (Waste Tracking Special Requests, Waste Tracking Database Software, Site Assessments, B&CB Staff Requests, Site generated waste disposal vaults) (Labor \$16,715.30 and Non-labor \$36,482.78) Included here are costs for specific special requests for waste disposal data from generators, regulators and others acting in official capacities. Also included are special projects related to site performance as directed by SC DHEC or other competent authority. Generally these projects are related to regulatory or technical site performance. Costs for vaults for disposal of certain site generated waste when routine disposal vaults are not available are also included here
952183.8002	Repairs to Barnwell Environmental and Dosimetry Laboratory (BEDL) (Labor \$840.80 and Non-Labor \$22,848.27) Repairs to the BEDL in fiscal year 2006-2007 included replacement of laboratory bench ventilation/fume hood, replacement of an air conditioning unit, roof leak repairs/resealing, and roof walkway refurbishment.
952188.8001 952188.8002 952188.8004 188000.8010	Appeal DHEC License, License Administration, SC Administrative Law Court Order Implementation, and Alternate Trench Construction Design (Labor \$41,652.60 and Non-Labor \$2,348.56) Non-routine activities by licensing department and others related to the appeal process for the DHEC radioactive materials license renewal. Included here are costs for CNS labor. Legal expenses are included in fixed costs. Also included here are costs for implementing actions directed by the Administrative Law Court Order related to the appeal of the license renewal.